

UNITED STATES DISTRICT COURT

NORTHERN

DISTRICT OF

ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

JOSEPH ROBINSON

CASE NUMBER:

(Name and Address of Defendant)

^{08 CR}
08CR 575

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about May 6, 2008 in Cook County, in the Northern District of Illinois defendant(s) did,

by intimidation, take from the person and presence of bank employees approximately \$2,814.50 belonging to and in the care, custody, control, management and possession of National City Bank, 2800 W. Armitage Avenue, Chicago, Illinois, the deposits of which were then insured by the Federal Deposit Insurance Corporation;

in violation of Title 18 United States Code, Section(s) 2113(a)

I further state that I am a Special Agent, FBI and that this complaint is based on the following facts:

FILED**JUL 18 2008 T.C**

See Attached Affidavit.

**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**UNITED STATES ATTORNEY
NORTHERN DISTRICT
CHICAGO, ILLINOIS**RECEIVED**
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Continued on the attached sheet and made a part hereof: x Yes No

Rafel Gut
Signature of Complainant

Sworn to before me and subscribed in my presence,

July 18, 2008
Date

at

Chicago, Illinois
City and State

MORTON DENLOW, U.S. Magistrate Judge
Name & Title of Judicial Officer

Morton Denlow
Signature of Judicial Officer

NORTHERN DISTRICT OF ILLINOIS

CHICAGO, ILLINOIS

State of Illinois

County of Cook

AFFIDAVIT

I, Raul S. Castro, first being duly sworn, state the following under oath:

1. I am a Special Agent with the United States Federal Bureau of Investigation (FBI) and have been employed as such for over eighteen years. I have been assigned to the FBI's Violent Crimes Task Force for approximately nine and one half months conducting investigations of bank robberies, kidnaping, extortions and other violent crimes. I am an "Investigative or Law Enforcement Officer" of the United States within the meaning of Section 2510(7) of Title 18, United States Code, in that I am empowered by law to conduct investigations and to make arrests for felony offenses. The information contained in this affidavit is based on my personal knowledge as well as documents I have reviewed and information provided to me by other law enforcement officers. This affidavit serves the limited purpose of establishing probable cause that JOSEPH ROBINSON robbed a National City Bank branch in Chicago, Illinois. It does

not contain all of the facts known to me regarding this case.

BANK ROBBERY INVESTIGATION

2. On May 06, 2008, at about 12:28 p.m., a man later identified as JOSEPH ROBINSON (as explained in paragraphs six through eight) walked into the National City Bank, located at 2800 West Armitage Avenue, Chicago, Illinois. After waiting in the customer line and leaning on the customer check stand, ROBINSON was called over by the female teller (hereinafter referred to as "VICTIM A"). ROBINSON was holding various papers stapled together, a black organizer and a black check book cover. ROBINSON stepped over to VICTIM A's window and waited as he fumbled through his papers. ROBINSON then said "Give me your money don't press anything." VICTIM A then stated, "What?" ROBINSON replied, "Give me your money don't press anything, no bait money."

3. VICTIM A gathered a quantity of money, and ROBINSON told VICTIM A to stop. VICTIM A then handed the money to ROBINSON, who grabbed the money with his left hand and calmly left the bank through the north exit.

4. FBI agents interviewed the victim and several witnesses inside the bank. Based on their collective descriptions, the robber was generally described as a black male, approximately 5'7" to 5'10" feet tall, weighing approximately between 140 to 175 pounds and wearing a brown

kangol hat, a long sleeve button down brown shirt and wearing sunglasses.

5. The bank reported a loss from the robbery of \$2,814.50 of United States currency. The bank was then and is now insured by the Federal Deposit Insurance Corporation.

IDENTIFICATION OF JOSEPH ROBINSON

6. On June 02, 2008, an anonymous tip was provided to the FBI, based on a local news report, that identified JOSEPH ROBINSON as the bank robber known as the KANGOL BANDIT II, who was wanted by the FBI for numerous bank robberies to include the May 6, 2008, National City Bank robbery in Chicago, Illinois.

7. A review of Illinois Secretary of State (SOS) records as well as state and federal criminal history records revealed that JOSEPH ROBINSON, born September 18, 1974, is a male, black, aged 33 years, standing 5'9" tall, weighing 170 lbs. My comparison of the bank's surveillance videos depicting the robber inside the bank to ROBINSON's SOS and arrest photos revealed that ROBINSON appears to be the robber.

8. On June 04, 2008, an array of photographs of six unnamed men, including a photo of JOSEPH ROBINSON was shown to VICTIM A, who immediately identified ROBINSON as the man who robbed the bank on May 06, 2008.

9. Based on the facts set forth above, there is probable cause to believe that JOSEPH ROBINSON violated Title 18, United States Code, Section 2113(a), in that he took, by intimidation, money belonging to or in the care, custody, control, management or possession of National City Bank, the deposits of which were insured by the FDIC.

10. Further affiant sayeth not.

Raul S. Castro

Raul S. Castro
Special Agent
Federal Bureau of Investigation
Chicago, Illinois

Subscribed and sworn before me this 18 day of July,
2008.

Morton Denlow

MORTON DENLOW
United States Magistrate Judge